

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LINDA BEDELL *et al.*,

Plaintiffs,

v.

GEORGE HECKLER *et al.*,

Defendants.

Civil Action No. 2:20-cv-03804-WB

STIPULATION OF JUDGMENT OF DEFENDANT GEORGE HECKLER

Plaintiffs Linda Bedell, the Linda Bedell Individual Retirement Account, Landon Bedell, Keaton Bedell, and Inner Design, Inc. Profit Sharing Plan (the “Plaintiffs”) and Defendant George Heckler (the “Defendant”) (together, the “Parties”) hereby agree to entry by this Court of this Stipulation of Judgment. The Parties hereby stipulate to the following:

1. On October 26, 2020, the Parties filed a Stipulation of Liability on Counts I, II, and VII of the Amended Complaint filed in this action (ECF 18);
2. The Parties have calculated the proper amount of damages for Defendant’s liability on Counts I, II, and VII of the Amended Complaint filed in this action; and,
3. The Parties stipulate to entry of judgment in the amount of \$26,155,015.14 against Defendant on Counts I, II, and VII of the Amended Complaint filed in this action.

/s/ Ira Neil Richards

David Smith (Pa. ID No. 21480)
Ira Neil Richards (Pa. ID No. 50879)
Daniel P. Lawn (Pa. ID No. 326114)
SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103

William C. Nystrom (*pro hac vice* pending)
Dana A. Zakarian (*pro hac vice* pending)
Nina S. Hirsch (*pro hac vice* pending)
NYSTROM BECKMAN & PARIS LLP
One Marina Park Drive, 15th Floor
Boston, MA 02210

Counsel for Plaintiffs

/s/ Lawrence G. McMichael

Lawrence G. McMichael (Pa. ID No. 28550)
DILWORTH PAXSON LLP
1500 Market Street, Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 557-7268
lmcmichael@dilworthlaw.com

Counsel for Defendant

ORDERED AND APPROVED:

/s/Wendy Beetlestone, J.

WENDY BEETLESTONE
U.S. DISTRICT COURT JUDGE

Dated: November 30, 2020